

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA)	
)	Docket No.: 1:13CR383
v.)	Judge O’Grady
)	
THOMAS BELL)	

DEFENDANT THOMAS BELL’S AMENDED MOTION TO ADOPT

COMES NOW Defendant Thomas Bell, by and through undersigned counsel, and respectfully submits this Amended Motion To Adopt, to be considered while respectfully requesting a waiver of Local Rule 12 of the Eastern District of Virginia requiring an individual pleading for each motion to adopt. Accordingly, Thomas Bell requests to adopt and conform the following previously filed motions by co-counsel:

1. ECF No. 137, Defendant’s Request for Trial Procedures, filed on behalf of Phillip G. Simpson;
2. ECF No. 143 Motion for Hearing to Determine Admissibility of alleged Co-conspirator Statements, filed on behalf of Timothy Robert McClain;
3. ECF No. 144, Motion for Additional Peremptory Challenges, filed on behalf of Timothy R. McClain;
4. ECF No. 145, Motion for Use of Court Room Technology, filed on behalf of Timothy R. McClain;

5. ECF No. 148, Motion to Compel Discovery or in the Alternative Strike the Government's Damages Figure, filed on behalf of Austen L. Stamm;

6. ECF No. 149, Motion to Compel Discovery for Exculpatory Information, filed on behalf of Austen L. Stamm;

7. ECF No. 151, First Motion to Dismiss Indictment, filed on behalf of Dennis O. Collins;

8. ECF No. 156, Sealed Exhibits re: [148] Motion to Compel Discovery or in the Alternative Strike the Government's Damages Figure, filed on behalf of Austen L. Stamm;

9. ECF No. 166, Motion to Compel Discovery, filed on behalf of Dennis O. Collins;

10. ECF No. 174, Motion for Leave to File Additional Motions, filed on behalf of Jeremy L. Heller;

11. ECF No. 175, Motion to Dismiss Indictment for Improper Venue, filed on behalf of Jeremy L. Heller;

12. ECF No. 177, Defendant Phy's Motion to Dismiss Indictment for Lack of Proper Venue, filed on behalf of Joshua S. Phy; and

13. ECF No. 178 Motion to Dismiss Defendant Phy's Motion to Dismiss Indictment as the Statute upon which it is based is Unconstitutionally Vague in Violation of Defendant's 5th Amendment Right to Due Process.

WHEREFORE, Defendant Thomas Bell respectfully moves this Court to allow him to adopt the motions, objections, and requests for instructions made by his co-defendants to the extent that he would benefit by them.

Respectfully submitted,

/s/

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Certificate of Service

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 28th day of April, 2014, which will send a notification of such filing (NEF) to the following: to Alexander T.H. Nguyen and Jay V. Brabhu, Assistant U.S. Attorneys, 2100 Jamieson Avenue, Alexandria, Virginia 22314 and all counsel of record.

_____/s/_____
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